ATTACHMENT G

MITIGATION MONITORING AND REPORTING PROGRAM

for the

Las Colinas Detention Facility Project
Final Environmental Impact Report

State Clearinghouse Number 2006091036

June 2009

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MITIGATION MONITORING AND REPORTING PROGRAM
LAS COLINAS DETENTION FACILITY PROJECT

Mitigation measures have been identified in the Final Environmental Impact Report for the Las Colinas Detention Facility Project to reduce or eliminate potential environmental impacts. The County of San Diego (County) is required to implement all adopted mitigation measures. In order to ensure compliance, the following mitigation monitoring and reporting program has been formulated. This program consists of a list of the project impacts and a detailed description of the mitigation measures.

A mitigation chart has been prepared for the project. The chart identifies each project impact and the related mitigation measure, monitoring schedule, and the person responsible for verifying compliance. The following is an explanation of the eight columns of the mitigation chart.

Column 1 **Impact**: Each impact is numbered and briefly described.

Column 2 **Mitigation Measure**: Each measure is numbered and briefly described.

Column 3 **Monitoring Activity**: This column identifies the County department or other public agency that is responsible for determining compliance with the mitigation measure and for informing DPW about compliance.

Column 4 **Timing**: The monitoring schedule depends upon the progression of the overall project. Therefore, specific dates are not used in the "Timing" column. Instead, scheduling describes a logical succession of events (e.g., prior to construction, annual) and, if necessary, delineates a follow-up program.

Column 5 **Responsibility**: This column identifies the party responsible for ensuring the mitigation measure is completed within the correct timing period.

Column 6 **Initial**: The monitor verifies completion of the particular mitigation measure by initialing and dating in this column. Where the "Timing" column indicates annual or other ongoing mitigation measures, verification of compliance may not occur until completion of the project. Provision of all required signatures within this column signifies conclusion of the monitoring program.

Column 7 **Date:** The monitor dates the completion of the mitigation measure, which is the same date that Column 6 is initialed.

Column 8 **Remarks**: The status of ongoing and cumulative mitigation measures is to be documented during each visit. This space should be used for specific comments

pertaining to the status of the mitigation measure. If there are additional comments, they should be attached to the chart. Progress reports are required for the revegetation program. Information provided in progress reports will be helpful in developing future mitigation programs.

This program is to be adopted by the lead and responsible agencies to comply with Public Resources Code Section 21081.6 and CEQA Guidelines section 15097.

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
Cultural Resources							
CR-1 and CR-3 Direct and cumulative potential impacts to three historical buildings	M-CR-1 Proposed mitigation for impacts to the Santa Maria Building, Dietary Building, and Rehabilitation Building includes: • Preparation of Historic American Buildings Survey (HABS) Level III documentation in accordance with the National Park Service's *Historic American Building Survey Guidelines for Preparing Written and Historical Descriptive Data*; • Written documentation and photographs of the history of the site and/or buildings, including documentation of oral interviews; and • Salvage of items such as call buttons and chapel windows that can be archived and/or incorporated into a future County facility.	The Department of General Services (DGS) will ensure that HABS Level III documentation is prepared, along with written documentation, photographs of the history of the site, and salvage of items.	Prior to demolition of historic buildings	DGS Project Manager and Project Archaeologist			
CR-2 Potential to result in impacts to unknown buried cultural resources during project grading activities	M-CR-2a Mitigation measures employed with regard to cultural resources will comply with the County's *Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources: Archaeological and Historic Resources*, dated December 5, 2007. Mitigation includes monitoring by the Project Archaeologist and a Native American during the original cutting of previously undisturbed deposits, determined necessary by the Project Archaeologist. Monitoring of the cutting of previously disturbed deposits would be determined by the Project Archaeologist. If potentially significant cultural resources are discovered, the Project Archaeologist would have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to	DGS will ensure that the project archaeologist shall be on site during all ground-disturbing activities and that cultural resources are properly handled if found.	During ground-disturbing activities	DGS Project Manager and Project Archaeologist			

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	allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the County Staff Archaeologist, would determine the significance of the discovered resources. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts would be prepared by the Project Archaeologist and approved by the Staff Archaeologist, then carried out using professional archaeological methods.						
	M-CR-2b All cultural material collected during the grading monitoring program shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. The mitigation would be considered complete when the County Staff Archaeologist received evidence in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of Planning and Land Use. The report shall include Department of Parks and Recreation Primary and Archaeological Site forms. If any human bones are discovered, the Project Archaeologist would contact the County Coroner. If the remains are determined to be of Native American	If resources are found, DGS will ensure that the project archaeologist performs a data recovery program.	During ground-disturbing activities	DGS Project Manager and Project Archaeologist			

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	origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the Project Archaeologist in order to determine proper treatment and disposition of the remains.						
	M-CR-3 Refer to M-CR-1.	DGS will ensure that HABS Level III documentation be prepared, along with written documentation, photographs of the history of the site, and salvage of items.	Prior to the demolition of historic buildings	DGS Project Manager and Project Archaeologist			
Biological Resources							
BI-1 Direct impacts to nesting birds/raptors	M-BI-1 To avoid any direct impacts to white-tailed kite, Cooper's hawk, California horned lark, raptor species, burrowing owl, or other nesting birds, removal of habitat that may support active nests shall occur outside of the combined breeding season of January 15 to September 15. If removal of habitat must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds within the construction area. The pre-construction survey must be conducted within 10 calendar days of the start of construction and the results submitted to the County for review and approval prior to initiating any construction activities. Nests that are detected within the proposed impact areas shall be flagged and avoided until nesting is completed. The nest shall be monitored to ensure that no nest is removed or disturbed until all young have fledged or the nest is no longer active. Construction activities shall be avoided for a distance of 300 feet around active nests identified within the project impact area.	DGS will ensure that the project biologist conducts pre-construction surveys if removal of habitat is expected to occur during the breeding season.	10 days prior to project construction	DGS Project Manager and Project Biologist			

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BI-2 Indirect noise impacts to offsite nesting birds	M-BI-2a To avoid indirect impacts from demolition and construction noise to breeding or nesting least Bell's vireo, white-tailed kite, yellow-breasted chat, Cooper's hawk, yellow warbler, and raptors within the noise contour greater than 60 dB(A) Leq, which is a distance of up to 500 feet from the project site, grading and other mechanized construction activities that produce noise in excess of 60 dB(A) Leq shall be conducted outside of the combined breeding season of January 15 to September 15 for these species. If construction activities must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting raptors and special status bird species listed above within areas exposed to noise levels greater than 60 dB(A) Leq. The pre-construction survey must be conducted within 10 calendar days of the start of construction and the results submitted to the County for review and approval prior to initiating any construction activities.	DGS will ensure that the project biologist conducts pre-construction surveys if construction is expected to occur during the breeding season.	10 days prior to project construction	DGS Project Manager and Project Biologist			
	M-BI-2b If nesting birds are detected during the pre-construction/pre-demolition survey, noise attenuating measures, such as noise walls or berms shall be used to reduce the level of noise within the habitat to less than 60 dB(A) Leq. A qualified acoustician shall monitor noise weekly during site clearing and monthly during active construction or as applicable based on construction schedule when excessive noise may be produced in order to document that the noise levels are kept below 60 dB(A) Leq.	DGS will ensure that noise-attenuating measures are utilized, and that the project acoustician noise monitors are on site during site-clearing and project construction activities.	During site clearing and project construction	DGS Project Manager and Project Acoustician			

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BI-3 Permanent removal of 0.6 acre of disturbed coastal sage scrub and 4.3 acres of non-native grassland	M-BI-3a Prior to project construction, preserve 1.2 acres (2:1 ratio) of Diegan coastal sage scrub and 2.4 acres (0.5:1 ratio) of non-native grassland off-site, in accordance with mitigation ratios generally accepted by the County for impacts to these types of habitat. Proposed mitigation consists of purchasing credits at the Rancho San Diego Mitigation Bank.	The DGS will ask Department of Public Works to deduct mitigation credits to offset habitat impacts.	Prior to project construction	DGS Project Manager			
	M-BI-3b Impacts to coastal sage scrub habitat may be allowed by obtaining a Habitat Loss Permit in accordance with Section 4(d) of the Endangered Species Act. The Section 4(d) Special Rule allows a loss of five percent of coastal sage scrub habitat in any individual subregion during the preparation of a regional NCCP. The wildlife agencies must concur with the Section 4(d) findings prior to allowing the impacts to coastal sage scrub habitat.	DGS will apply for an HLP and ensure that the wildlife agencies concur with the Section 4(d) findings of the Endangered Species Act.	Prior to project construction	DGS Project Manager			
BI-4 Loss of 0.04 acre of ACOE/CDFG/ RWQCB-jurisdictional ephemeral waters	M-BI-4 Prior to impacts to 0.037 acre (0.04 acre when rounded) of ephemeral drainage under the jurisdiction of ACOE, CDFG and RWQCB, the County shall obtain the following permits: ACOE 404 permit, RWQCB 401 Water Quality Certification, and a CDFG Code 1600 Streambed Alteration Agreement. Impacts shall be mitigated at a 1:1 ratio by creation or purchase of credits for the creation of jurisdictional habitat of similar functions and values. A suitable mitigation site shall be selected and approved by the resource agencies during the permitting process. The site shall be located within the vicinity of the drainage impact or within the watershed of the San Diego River. A conceptual wetland mitigation plan shall be prepared by the	DGS will ensure that the necessary permits are obtained prior to construction. In addition, DGS will ensure that the project biologist prepares a conceptual wetland mitigation plan, obtains its approval by the resource agencies, and will ensure that mitigation for permanent impacts to jurisdictional ephemeral waters will be performed within the watershed of the San Diego River.	Prior to, during, and after project construction	DGS Project Manager and Project Biologist			

Impact	Mitigation Measures	Monitoring Activity	Timing	Responsibility	Initial	Date	Remarks
	County and approved by the resource agencies as required by the applicable permits.						
BI-5 Removal of one coast live oak tree on the existing LCDF site	M-BI-5 Impacts to one coast live oak tree will be mitigated by planting two replacement coast live oak trees. The replacement trees shall be at least 5-gallon size since trees that are of this size have been shown to be healthier and to grow more quickly than trees that are in larger containers. The trees shall be planted within the landscaped areas of the proposed project where it is suitable to include a relatively large tree and shall be monitored for a period of 5 years. If the trees die during the monitoring period, the trees shall be replaced.	DGS will ensure that replacement trees are of sufficient size, are planted appropriately, and are monitored for 5 years. DGS will ensure that the trees are replaced if either or both die during the 5-year monitoring period.	During landscaping phase of construction and after construction	DGS Project Manager			
Geology/Soils							
GE-1 Indirect geology and soils impacts related to liquefaction effects	M-GE-1 Prior to grading, the County shall ensure that the proposed project's grading plans demonstrate compliance with remediation recommendations in the June 28, 2004 Geotechnical Investigation for the Town Center Specific Plan prepared by Geocon (2004), including but not limited to: a) Previously placed fill and alluvium within areas of planned new grading or improvements shall be removed and recompacted. b) To provide uniform bearing conditions for support of planned buildings and improvements, the upper 5 feet of Younger and Older Alluvium shall be removed and recompacted. c) Finish-grade elevations for building pads shall be designed so that at least 10 feet of properly compacted fill exists above the groundwater to provide a sufficient thickness of non-liquefiable soil. d) Prior to placing new fill, the base of	DGS will ensure that the grading plans comply with the recommendations found in the 2004 Geotechnical Investigation prepared by Geocon.	During the preparation of construction plans	DGS Project Manager and Project Engineer			

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	overexcavations shall be scarified to a depth of at least 12 inches, heavily moisture conditioned, and compacted. This should result in densification of the upper 2 to 3 feet of existing soil at the base of the excavation. Fill soils may then be placed and compacted in layers to the design finish-grade elevations. The layers shall be no thicker than will allow for adequate bonding and compaction. All fill (including scarified ground surfaces and wall and utility trench backfill) shall be compacted to at least 90 percent of maximum dry density at near-optimum moisture content or slightly above as determined by ASTM D1557-02.						
GE-2 Unstable and expansive soils could result in damage to facilities	M-GE-2 Implementation of M-GE-1 described above would reduce impacts due to unstable soils to below a level of significance.	DGS will ensure that the grading plans comply with the recommendations found in the 2004 Geotechnical Investigation prepared by Geocon.	During the preparation of construction plans	DGS Project Manager and project engineer			
Hazards and Hazardous Materials							
HZ-1 Accidental spills of hazardous materials during construction activities could potentially cause soil or groundwater contamination	M-HZ-1a Prior to construction (including demolition), all contractor and subcontractor project personnel shall receive training regarding the appropriate work practices necessary to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures.	The DGS will ensure that all personnel receive the required hazardous materials training.	Prior to project construction	DGS Project Manager			
	M-HZ-1b The construction contractor shall ensure that no hazardous materials are disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment shall be	DGS will ensure that the construction contractor properly disposes of hazardous materials.	During project construction	DGS Project Manager			

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	provided for all trash. All potentially hazardous material construction waste shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials.						
	M-HZ-1c A hazardous substance management, handling, storage, disposal, and emergency response plan shall be prepared and implemented by the construction contractor. The plan shall include measures that comply with all applicable laws and regulations to ensure that risks of release of materials through use, transport and disposal of the materials are reduced to the maximum extent practicable. The final plan shall be approved by the County Department of General Services.	DGS will ensure that this plan is prepared and implemented by the construction contractor.	Prior to and during project construction	DGS Project Manager			
	M-HZ-1d The construction contractor shall ensure that hazardous materials spill kits are maintained onsite for small spills.	DGS will ensure that the construction contractor maintains hazardous materials spill kits for small spills.	Prior to and during project construction	DGS Project Manager			
HZ-2 During demolition and construction, contaminants could be mobilized if contaminated soil is exposed to runoff that could transport hazardous substances outside the work area, which could cause a threat to the public and waters in the vicinity of the project	M-HZ-2a If hazardous waste and/or hazardous materials are encountered during demolition of existing facilities, grading, construction, or operation of proposed facilities, the County shall ensure compliance with CCR Title 23 and Title 26 and health and safety regulations as enforced by the San Diego County DEH. Excavated soils appearing to be impacted by hazardous waste or materials shall be characterized, managed and disposed of in accordance with the San Diego County DEH Site Assessment and Mitigation (SAM) manual. This determination can be made by a visual (i.e., stained soil) and/or odor assessment. The San Diego County DEH and	DGS will ensure compliance with the California Code of Regulations (CCR) Title 23 and Title 26 and health and safety regulations enforced by DEH if hazardous waste and/or hazardous materials are encountered. DGS will ensure that County DEH and RWQCB are notified as necessary.	Prior to, during, and after project construction	DGS Project Manager			

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	RWQCB shall be contacted regarding the possible reuse of soils contaminated by hydrocarbons for backfill.						
	M-HZ-2b Due to the potential for residual pesticides to be in the soil on the project site, soil samples shall be collected on the proposed project site prior to construction. Samples shall be analyzed by a certified laboratory for organochlorine pesticides. The sampling program shall be conducted in accordance with the San Diego County SAM manual. If pesticides above permissible exposure limits for residential uses are detected from the site, a program shall be implemented by San Diego County General Services to properly remediate affected soils in accordance with the County DEH's SAM manual standards.	DGS will ensure that soil samples are collected and analyzed in accordance with the County of San Diego SAM manual prior to construction.	Prior to project construction	DGS Project Manager			
	M-HZ-2c Any septic systems and above ground storage tanks located onsite shall be removed and/or closed under permit and approval of County DEH prior to grading.	DGS will ensure that any septic systems and above ground storage tanks shall be removed in accordance with permits and/or approvals of DEH.	Prior to project construction	DGS Project Manager			
HZ-3 The existing LCDF structures may contain hazardous materials such as asbestos and lead paint, and these substances could be released during demolition, also resulting in a significant indirect impact	M-HZ-3a Prior to the start of demolition, an asbestos survey shall be performed by the Department of Environmental Health (DEH), Occupational Health Program (OHP) for all onsite structures that will be disturbed by demolition activities in accordance with County of San Diego Administrative Manual Asbestos Policy 0050-01-9. The survey shall cover the entire building to be demolished, document the location and types of asbestos found, and determine whether any on-site abatement of asbestos	DGS will ensure that an asbestos survey is performed for all on-site structures that will be disturbed. If asbestos is located, an abatement work plan shall be prepared by County DEH. DGS will ensure that APCD and Cal OSHA are notified as necessary.	Prior to demolition of existing structures	DGS Project Manager and DEH Occupational Health Program certified asbestos inspector			

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	containing materials is necessary. If asbestos is located during the survey, an abatement work plan shall be prepared by County DEH in compliance with local, state, and federal regulations for removal of such materials. The work plan shall include specifications for the proper removal and disposal of asbestos. County DEH, OHP, or designee will provide project surveillance of the asbestos work activities to ensure that proper controls are implemented and to ensure compliance with the work plan requirements and abatement contractor specifications. Any necessary asbestos sampling and abatement shall be done by a Cal/OSHA certified asbestos consultant/contractor. In addition, the Air Pollution Control District (APCD) and the California Occupational Safety and Health Administration (Cal/OSHA) have notification requirements pertaining to the disturbance of asbestos containing materials (ACMs). When applicable, these notifications shall be made prior to the activity as follows: a. 10-day notification to APCD for renovation/demolition activities (Note: These are 10 working days; asbestos activities can start on the 11th day. Working days means Monday through Friday including holidays that fall on these days.) b. 24-hour notification to Cal/OSHA.						
	M-HZ-3b Prior to the start of demolition, a lead based paint survey shall be performed by a Certified Lead Inspector/Assessor as defined in Title 17, CCR Section 35005 for all onsite structures that will be disturbed by demolition activities in accordance with local, state and federal regulations. The survey shall	DGS will ensure that a lead based paint survey is performed. If lead based paint is located, DGS will ensure that an abatement work plan is prepared.	Prior to demolition of existing structures	DGS Project Manager and DEH Occupational Health Program Certified Lead Inspector			

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	cover the entire building to be demolished, document the location and types of lead based paint found, and determine whether any on-site abatement of lead based paint is necessary. If lead based paint is located during the survey, an abatement work plan shall be prepared by County DEH in compliance with local, state, and federal regulations for any necessary removal of such materials. The work plan shall include specifications for the proper removal and disposal of lead based paint. County DEH, OHP, or designee will provide project surveillance of the lead based paint work activities to ensure that proper controls are implemented and to ensure compliance with the work plan requirements and abatement contractor specifications.						
HZ-4 & 5 If the BEP document was not updated to account for the additional hazardous materials that could be used, a significant indirect impact could result. Also, the project's potential to emit and/or handle hazardous materials within one-quarter mile of schools would be potentially significant.	M-HZ-4 & 5 Prior to opening Las Colinas, SDSD shall update its BEP to include the transport, storage, use, and disposal of hazardous materials during operation of the proposed project. These updates shall include the use of chemicals currently used at the LCDF, as well as any new chemicals to be used at the new facility. The updated BEP shall be submitted to the San Diego County DEH for review and approval. All chemicals shall be managed in accordance with the California Hazardous Waste Control Law (Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (CCR, Title 22, Division 4.5). Also, prior to construction, the State Department of Toxic Substances Control (DTSC) shall be contacted to determine if a DTSC permit is required.	SDSD will update its BEP to reflect transport, storage, use, and disposal of hazardous materials. Additionally, the SDSD will contact the DTSC prior to project construction to determine if a DTSC permit is required.	Prior to the opening of Phase I of Las Colinas	Sheriff Department Project Manager			

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Hydrology and Water Quality							
HY-1 Without proper management of sediment and pollutants, the project could violate water quality standards	M-HY-1 The County shall implement Low Impact Development Integrated Management Practices (LID IMPs) to reduce stormwater runoff rates and duration. The LID IMPs shall provide at least a 19.1 percent reduction in stormwater runoff rates to achieve no net increase in flow quantities and rates discharged from the project site. This reduction shall be accomplished by strategic placement of LID IMPs uniformly throughout the project site to mimic the natural flow regime and capture any net increase in runoff through increased infiltration. The following specific LID IMPs shall be considered in the project's final design to meet the 19.1 percent reduction in stormwater runoff: • Vegetated roof systems • Infiltration trench/islands/beds • Vegetated or rock swales/filter strips • Rain water harvesting (cisterns/rain barrels) • Bioretention • Permeable pavement and materials	DGS will ensure that LID IMPs be implemented into the project design to reduce stormwater runoff rates and duration.	During project design phase and prior to the start of construction	DGS Project Manager and Project Engineer			
HY-2 The project would result in an increase in impervious surfaces compared to what was projected in the conceptual design, resulting in the potential for direct impacts to the existing drainage system	M-HY-2 The City of Santee has established drainage fees, which are typically collected upon issuance of a building permit for projects within City limits. While the County is not required to obtain a building permit from the City, the County shall pay a fee based on City's development impact fee worksheet. The County shall pay the fee before the start of construction.	DGS will pay a drainage fee based on the City's development impact fee worksheet.	Prior to project construction	DGS Project Manager			